

January 6, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: 30-Day Report for AL Exceedance for Sulfate at Operational Monitor Well MW01-O
Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1

Dear Mr. Albright:

Florence Copper is providing this 30-day report for an alert level (AL) exceedance for sulfate at operational monitor well MW01-O under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit). As required by Part II.H.2.a.iv. of the Permit, Florence Copper has evaluated the cause and impacts of the exceedance and reviewed mitigation strategies.

On November 24, 2020, Florence Copper became aware of a potential AL exceedance for sulfate at operational monitor well MW01-O from a routine quarterly sample collected on October 21, 2020. The laboratory result for this sample was 302 mg/L. The UIC Permit AL for sulfate is 229 mg/L for this well. A verification sample collected on November 18, 2020 confirmed the AL exceedance with a sulfate result of 242 mg/L. There is no aquifer quality limit (AQL) for sulfate.

Following verification of the exceedance, Florence Copper initiated an investigation into the cause of the AL exceedance. No malfunction or failure of pollution control devices or other equipment or process occurred that contributed to the alert level exceedance. Hydraulic control has been maintained as required by the permit throughout operation of the PTF and continues today.

MW01-O is located northwest of Florence Copper's Production Test Facility (PTF) wellfield (Figure 1). The closest oxide observation wells are M57-O, to the southwest and M58-O to the northeast. The fourth quarter 2020 sample result for sulfate at M57-O was 69.5 mg/L and 25.4 mg/L at M58-O. These sulfate concentrations are well below the ALs. Downgradient from MW01-O, fourth quarter 2020 sulfate levels at point of compliance wells M54-O and M22-O were also well below the ALs at 51.8 mg/L and 51.7 mg/L, respectively.

Sulfate concentrations at MW01-O decreased by 60 mg/L between the October 21 and November 18, 2020 sampling events. As rinsing activities continue in the wellfield, sulfate levels are expected to decrease.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.



Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ

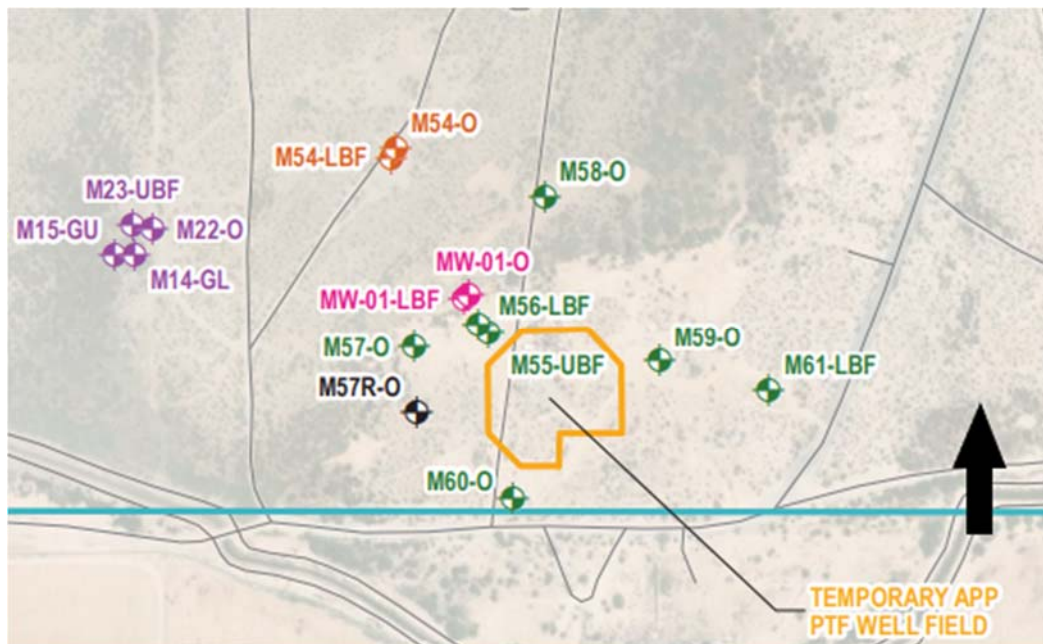


Figure 1. PTF monitor wells.